Response to Comments

United Sates Navy
San Clemente Island Wastewater Treatment Plant
(SCI WWTP)
Tentative Waste Discharge Requirements and NPDES Permit

This table describes all significant comments received from interested persons regarding the tentative permit described above. Each comment has a corresponding response and action taken.

#	Comment	Response	Action Taken
Comments received from the United States Navy on October 18, 2018			
1	The permitted flow is a monthly average of 0.025 million gallons per day (mgd). Please revise the following for consistency: a. Tentative Order, Page 18, Section VI.C.2.d, 2nd sentence: revise to "However, for the SCI WWTP, the authorized monthly average of 0.025 mgd already …" b. Fact Sheet, Page F-3, Table F-1, Facility Permitted Flow: revise to "monthly average of 0.025 million gallons per day (mgd)"	The suggested changes were incorporated.	Revisions were made to the permit.
2	a. Attachment F, Table F-2 and F-13: Request reconsideration of increased monitoring frequencies for parameters with highest values reported as DNQ only. b. Concentration used as TCDD equivalents highest value was not converted from pg/L to ug/L when submitted and should	2a. During preparation of the Tentative Order, Regional Water Board staff reviewed the data for pollutants that had no detections except data reported as DNQ. Staff used Best Professional Judgement (BPJ) to reduce the monitoring frequencies for these pollutants where appropriate. If the maximum estimated concentration of the pollutant was less than the water quality objective at the edge of the zone of	Revisions were made to the permit.

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	have been 8.96 x 10^{-9} ug/L (see attached TCDD results from laboratory report); therefore, request reevaluation of TCDD equivalents.	initial dilution (which includes the approved dilution ratio), the semiannual monitoring frequency for that pollutant was maintained. This procedure was used to determine the monitoring frequencies for chromium VI, chromium III, dichloromethane, and halomethanes, in the Tentative Order. In response to the comment, staff determined that the maximum estimated values for lead and endosulfan are several orders of magnitude less than their respective water quality objectives at the edge of the zone of initial dilution. As a result, the monitoring frequencies for lead and endosulfan were reduced to semiannually. The monitoring frequency for mercury was not modified because the most sensitive analytical method was not used during the last permit cycle and the maximum estimated concentration for mercury suggests the most sensitive analytical method will produce detectable results. The monitoring frequencies for heptachlor and heptachlor epoxide were not modified since the estimated effluent concentration for each pollutant is greater than the water quality objective after considering dilution. On October 24, 2018, Regional Water Board and Navy staff discussed the Navy's concerns regarding this comment. The Navy expressed concerns with the increased monitoring frequency in the Tentative Order for those pollutants detected below the water quality	

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		objective at the edge of the zone of initial dilution. The Navy provided Regional Water Board staff with a list which included arsenic, nickel, cyanide, ammonia, HCH, tributyltin, bis(2-ethylhexyl) phthalate, chlorodibromomethane, chloroform, and dichlorobromomethane. Regional Water Board staff considered the proposal and will retain the monitoring frequencies in the existing Order (i.e., semi-annual monitoring) for arsenic, nickel, cyanide, tributyltin, bis(2-ethylhexyl) phthalate, chlorodibromomethane, chloroform, and dichlorobromomethane. The maximum concentration reported for each of these pollutants is a minimum of 80% less than its corresponding water quality objective at the edge of the zone of initial dilution. The monitoring frequency for ammonia was not modified from the Tentative Order, however, because the pollutant was consistently detected during the last permit cycle and because ocean ecosystems are sensitive to ammonia. The monitoring frequency for HCH was not modified because the maximum effluent concentration reported of 0.48 µg/L is close to the water quality objective after considering dilution of 0.548 µg/L. 2.b. Regional Water Board staff reviewed the corrected reported concentration for TCDD equivalents for May 2013 (8.96×10^{-9} µg/L). The reported value from the laboratory was in picograms per liter whereas the Discharger's reported value was in micrograms per liter. Since the units for the Discharger's reported	

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		value were not converted properly, Regional Water Board staff repeated the reasonable potential analysis for TCDD equivalents with the correct value. The analysis indicates that TCDD equivalents continues to have reasonable potential to exceed the water quality objectives and therefore still requires final effluent limitations. Since TCDD equivalents requires effluent limitations, monthly analysis is required.	
3	Attachment E, Page E-26, Table E-7: the monitoring frequency for Ammonia Nitrogen was changed from annually to monthly. Request the frequency be retained as annually.	The correction was made.	Revision was made to the permit.
4	Attachment E, Page E-16, Section V.A.3.b: to clarify applies to urchin or sand dollar, request text be revised to "A static non-renewal toxicity test with the purple sea urchin, *Strongylocentrotus purpuratus*, or the sand dollar, *Dendraster excentricus* (both using Fertilization Test Method 1008.0), or a …"	The suggested change was incorporated.	Revision was made to the permit.
5	Attachment E, Page E-19, Section V.A.7, 2nd paragraph: request 2nd sentence be revised to increase time for initiation of the first of four accelerated monitoring tests to "within fourteen calendar days" of the Discharger becoming aware of the result. Otherwise, allow the Water Board to grant an extension in cases where	Since toxicity may be episodic, accelerated monitoring should occur as soon as possible after toxicity is initially detected. Although 7 days may be enough time to initiate accelerated monitoring under normal circumstances, the Regional Water Board understands that San Clemente Island is a remote facility with limited transportation options to and from the island and that laboratories occasionally have	Revisions were made to the permit.

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	there are logistical issues for sample collection or delays in the time needed for the laboratory to obtain new specimens for testing.	difficulty securing organisms. If toxicity is detected in the effluent and the Navy is not able to transport a sample off the island within the required timeframe or if the contract lab is not able to immediately secure organisms, the Navy may submit a written request to the Regional Water Board Executive Officer to delay accelerated monitoring until samples can be transported off the island or until the lab is able to obtain the organisms. Additional language was added to this section to address this concern.	